

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re: : CHAPTER 13
Kevin Wallace :
Debtor : BANKRUPTCY NO.: 19-13240 AMC

RESPONSE TO MOTION FOR RELIEF

Debtor, by his attorney, Brandon J. Perloff, Esq. by way of Response to Movant's Motion, respectfully represents the following:

1. Admitted.
2. Admitted.
3. Denied. Movant refers to documents on record before the Court. Said documents speak for themselves. The Debtor does not attest to the veracity of said documents, and therefore the averments referencing said documents in the corresponding paragraph are denied.
4. Admitted.
5. Denied. The Debtor does not have the requisite knowledge to attest to the veracity of Movant's allegation. By way of further response to the best of the Debtor's knowledge, the Movant had not commenced a mortgage foreclosure action, nor did the Movant indicate to the Debtor that it intended to commence such action prior to the time the Debtor filed the instant bankruptcy.
6. Denied. The Debtor has made the post-petition payments listed in the Movant's corresponding averment.
7. Denied. The Debtor is without requisite knowledge of attest the veracity of Movant's averment. By way of additional response, assuming *arguendo* that Movant is entitled to any fees, expenses or charges ("Costs") resulting from late payments, the Debtor intends to resolve said Costs via stipulation and/or would not object to reasonable, actual and necessary Costs being listed in accordance with Fed Bankr. R. 3002.1.
8. Denied. By way of further response, should the Debtor owe any post-petition amounts, the Debtor intends to cure all post-petition payments, which may be due at this time.
9. Denied. Payments have been sent but have yet to post to the Trustee's website (<https://www.trustee13.com>).

10. Denied. Movant's averment is conclusion of law to which to response is required.

11. Denied. Movant's averment does not call for a response.

WHEREFORE, Debtor pray that the Movant's request for relief be denied.

Respectfully submitted,

Date: 8/15/19

/s/ Brandon J. Perloff
Brandon J. Perloff Esquire.
Attorney for Debtor